

Before the
Federal Communications Commission
Washington, DC 20554

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MAY 26 1993

FCC MAIL BRANCH

In the Matter of)

Replacement of Part 90 by Part 88 to)
Revise the Private Land Mobile Radio)
Services and Modify the Policies)
Governing Them)

PR Docket No. 92-235

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MAY 26 1993

To: The Commission

Comments of the
National Associations of State Foresters

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The National Association of State Foresters (NASF) is a non-profit organization comprised of the designated State Foresters in each of the states and territories of the United States. State Foresters are the administrative heads of the state forestry agencies that have legal responsibility for the prevention and control of wildfire on non-federal forestland within their jurisdiction. These agencies are required by law to provide wildfire prevention, detection, and control on nearly 1/2 billion acres of

1. Limit consideration of bandwidth reductions to 12.5 KHz no sooner than ten years after the docket is finalized and address additional bandwidth reductions at a later date when it is clearer what new technologies are appropriate.
2. Maintain compatibility with federal government channel assignments.
3. Retain the current radio services. Any additional channels that result from bandwidth reductions should be retained in the originating service. The Forestry-Conservation Communications should continue as the certified frequency coordinator for the Forestry-Conservation Radio Service.
4. Give special consideration and protection to wide-area coverage systems including exclusive frequency assignments and signal strength limitations at boundaries of service areas.

The NASF encourages the Commission to assign any additional channels in the 150-174 MHz band, which result from bandwidth reductions to 12.5 KHz, to state government agencies for statewide radio systems. The 150-174 MHz band is the most suitable band for wide-area systems and such an assignment would be appropriate. These channels could be the basis for consolidated statewide trunked radio systems.

Respectfully submitted,

National Association of State Foresters